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U.S. Robotics®
The Intelligent Choice in Information Access
George A. Vinyard
Vice President and General Counsel

April 30, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20054

Re: Comments of U.S. Robotics Corporation.
RM-8784

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Dear Mr. Caton:

Attached are the Comments of U.S. Robotics Corporation concerning the petition of Sky Station International, Inc. to permit the commercial use of the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands.

An original and five copies of the Comments are provided.

Sincerely,

George A. Vinyard

George A. Vinyard
Vice President and General Counsel

Writer's Direct Numbers
Phone: 708-933-5830
Fax: 708-933-5149
internet: gvinyard @usr.com

8100 N. McCormick Blvd.
Skokie, IL 60076-2999
Phone: 847-982-5010
Web: http://www.usr.com

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Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 200554

In the Matter of Amendment of Parts 2 and 15 of the Commission's Rules to Permit Use of Radio Frequencies Above 40 GHz for New Radio Applications	RM-8784
Petition of Sky Station International, Inc. Amendment of the Commission's Rules to Establish Requirements for a Global Stratospheric Telecommunications Service in the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands	

COMMENTS

U.S. Robotics Corporation ("U.S. Robotics") submits these Comments in support of the Petition of Sky Station International, Inc. ("Sky Station") to permit commercial use of the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands. Permitting the use of these frequencies will spur development of new technologies and create new methods for broadband and portable wireless access to the Internet. Broadband radio communications provide an alternative to the need to hardwire computers in order to gain access to the World Wide Web and other Internet and digital services.

Statement of Interest

U.S. Robotics Corporation, headquartered in Skokie, Illinois, was founded in 1976 and is one of the world's leading suppliers of products and systems that provide access to information. The company designs, manufactures, markets and supports remote access servers, enterprise communications systems, desktop/mobile client products and modems and telephony products that connect computers and other equipment over analog, digital and switched cellular networks, enabling users to gain access to, manage and share data, fax and voice information.

U.S. Robotics' customers include Internet service providers, regional Bell operating companies, inter-exchange carriers and a wide range of other large and small businesses, universities, financial organizations, government entities, institutions and individuals. U.S. Robotics has helped its customers build some of the largest networks in the world.

In a recent analysis of market research from IDC, Forrester and other sources, U.S. Robotics estimates that a substantial percentage of individuals accessing the Internet and online services subscribe to providers who use U.S. Robotics' Total Control Enterprise Network Hub as their high-speed access platform.

U.S. Robotics is the only company with positions in every major segment of the information access market -- mobile communications, desktop communications and remote access equipment. This end-to-end strategy allows the company to quickly spread new technology across a number of markets, develop seamless systems and adapt to continued advances.

U.S. Robotics has made long term investments developing and building its own technology at its own production facilities. It's R&D department has functioned as an industry leader, consistently setting industry standards and developing innovative information access methods U S. Robotics employs more than 500 research engineers in seven research centers to ensure its continued success

U.S. Robotics' employs over 5000 people worldwide and had sales of $889.3 million for fiscal year 1995. Research and Development expenditures aimed at broadening the information access market by developing new and superior technologies totaled $52 million dollars for fiscal year 1995 In the first six months of fiscal year 1996, U.S. Robotics reported sales of $819.3 million and R&D expenditures of nearly $52 million.

Comments

We believe that the development of new technologies to take advantage of the 47.2-47.5 GHz and 47.9-48.2 GHz frequencies may prove valuable to the public through the provision of affordable portable broadband Internet access and related digital communications. As a company dedicated to worldwide leadership in communications, computer technologies, and information access, U S. Robotics recognizes the potential achievement and promise offered by these new technologies.

The ability of broadband radio communications to release computer communications from its dependence on wired technology is important to the world economy. We support the prospect of global wireless access to the Internet and other digital communications and information services at an affordable price and encourage the FCC to permit use of the 47.2-27.5 GHz and 47.9-48.2 GHz frequencies. thereby encouraging the development of new technologies to realize the potential such broadband communications will create.

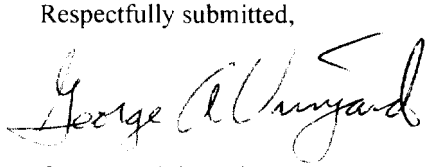
As a manufacturer, U.S. Robotics is especially interested in the potential capacity of a truly global broadband communications system. Manufacturing client equipment, base stations, and servers for this vast market offers an excellent opportunity for job growth in the United States. U.S. Robotics is well aware of the increased demands for personnel which come with innovative technologies and an increasingly global marketplace: in 1995 U.S. Robotics work force grew by over 100 percent in response to the growing demand by businesses and individuals for superior methods for accessing, managing, and sharing information.

U.S. Robotics has the technical and manufacturing resources and capabilities to participate actively in developing, refining, and manufacturing the high speed modems and other data transmission equipment needed to implement new broadband communications systems. This is evident from U.S. Robotics' historical track record as an innovative manufacturer and its ongoing investments in state of the art manufacturing facilities in the United States.

Summary

There is a serious need for technologies and products which will provide new methods of remote access at a low cost. We urge the Commission to permit the use of the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands for development of new broadband communications technologies.

Respectfully submitted,



George A. Vinyard
Vice President and General Counsel